

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION**

WINFORD DALLAS JONES,	:	
	:	
Plaintiff	:	
	:	
v.	:	Civil Action No. 7:06-CV-00547
	:	
LORETTA M. D'SOUZA, Personal	:	
Representative of the ESTATE OF	:	
KRISTINA MAE ARCISZEWSKI,	:	
deceased, et al.,	:	
	:	
Defendants.	:	

PLAINTIFF'S DISCLOSURE OF EXPERT WITNESSES

THIS DAY comes plaintiff, Winford Dallas Jones, by counsel, pursuant to Federal Rule of Civil Procedure No. 26(a)(2)(A) & (B) and the Pretrial Scheduling Order entered herein, and submits the following expert disclosures to defendants Robinson:

A. **NON-RETAINED EXPERTS**

1. Thomas E. Shuler, M.D., Carilion Orthopedic Surgery, 2017 South Jefferson Street, Roanoke, Virginia 24014; 540/981-7406. Dr. Shuler is an orthopedic surgeon who treated plaintiff's serious orthopedic injuries, both during and after plaintiff's hospitalization at Carilion Roanoke Memorial Hospital, following the subject motor vehicle collision. Dr. Shuler has knowledge of the nature and extent of plaintiff's injuries; his care and treatment of those injuries; the nature and extent of any permanent residuals and/or impairments which plaintiff now has because of those injuries; the costs

associated with plaintiff's medical care; and the need for any future medical care and treatment and the costs associated therewith.

2. Carl R. Shelton, M.D., Medical Rehabilitation Associates, 155 Springhaven Drive, Princeton, West Virginia 24740; 304/431-3010. Dr. Shelton is a rehabilitation specialist who provided and continues to provide care and treatment to plaintiff, both as an inpatient at HealthSouth (Southern Hills Rehabilitation Hospital) and as an outpatient. Dr. Shelton has knowledge of the nature and extent of plaintiff's injuries; his care and treatment of those injuries; the nature and extent of any permanent residuals and/or impairments which plaintiff now has because of those injuries; the costs associated with plaintiff's medical care; and the need for any future medical care and treatment and the costs associated therewith.

3. Charles E. Shamro, M.A., M.S., C.B.T., Medical Rehabilitation Associates, 155 Springhaven Drive, Princeton, West Virginia 24740; 304/431-3010. Mr. Shamro is a licensed psychologist who provided and continues to provide psychological counseling to plaintiff because of a single episode acute depressive condition and acute stress reaction to the motor vehicle collision and plaintiff's resulting injuries. Mr. Shamro has knowledge of the nature and extent of plaintiff's psychological injuries; his care and treatment of those injuries; the nature and extent of any permanent residuals and/or impairments which plaintiff now has because of those injuries; the costs associated with plaintiff's psychological care and treatment; and the need for any future psychological care and treatment and the costs associated therewith.

4. Plaintiff reserves the right to call any additional doctors who plaintiff may see, as well as ancillary medical personnel who have provided medical care and treatment to plaintiff, including physical therapists, physicians' assistants, and others.

B. RETAINED EXPERTS

1. Larry A. Lynch, Ph.D., L. A. Lynch & Associates, 49 Hawthorn Road, Salem, Virginia 24153; 540/389-6764. Dr. Lynch is a forensic economist, who has been retained by plaintiff regarding plaintiff's loss of earnings and earnings potential, as well as the loss of and/or decrease in plaintiff's fringe benefits. Dr. Lynch's report and other information as required by Rule 26(a)(2)(A) & (B) is attached hereto.

2. John Newman, Vocational Rehabilitation Associates, P. O. Box 21088, Roanoke, Virginia 24018. Mr. Newman is a vocational rehabilitation specialist who has been retained by plaintiff regarding plaintiff's vocational status and plaintiff's current physical and emotional status as they relate to his employability. Mr. Newman's preliminary report and other information as required by Rule 26(a)(2)(A) & (B) is attached hereto.

3. Susan Wirt, BSN, RN, Wirt & Associates, P. O. Box 8, Catawba, Virginia 24070; 540/529-3631. Ms. Wirt is a life care planner who has been retained by plaintiff regarding the cost of his future medical care and treatment needs. Ms. Wirt's preliminary report and other information as required by Rule 26(a)(2)(A) & (B) is attached hereto.

The foregoing experts may rely upon exhibits, including records and documents of plaintiff's employment, such as income tax returns, job descriptions, and records relating to plaintiff's compensation, benefits and wage loss.

4. Thomas Corsi, Ph.D., Michelle Smith Professor of Logistics, Director Supply Chain Management, Logistics, Business & Public Policy, Robert H. Smith School of Business, 3321 Van Munching Hall, University of Maryland, College Park, Maryland 20742-1815; 301/405-2197. Dr. Corsi's opinion and/or report will be subsequently provided by agreement of the parties' counsel.

The foregoing expert may rely upon exhibits, including any documents provided by plaintiff and defendant in response to Interrogatories and Request for Production of Documents, or other discovery; deposition transcripts and videotapes; and excerpts from various treatises and/or authoritative literature.

Respectfully submitted,

WINFORD DALLAS JONES

s/ Gary C. Hancock
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Counsel for Plaintiff, Winford Dallas Jones

CERTIFICATE OF SERVICE

I do hereby certify that I have this 21st day of June 2007 electronically filed the foregoing Plaintiff's Disclosure of Expert Witnesses using the CM/ECF system which will send notification of such filing to Paul C. Kuhnel, Esquire, Wooten Hart PLC, P.O. Box 12247, Roanoke, Virginia 24024-2247, Counsel for C.H. Robinson Worldwide, Inc.; C. H. Robinson Company; C. H. Robinson Company Inc.; C. H. Robinson Company LP; C. H. Robinson International, Inc.; C. H. Robinson Operating Company LP; and C. H. Robinson Transportation Company Inc.

s/ Gary C. Hancock
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